

# **EXHIBIT I**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF THELMA SAVERY**

I, Thelma Savery, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based upon my personal knowledge unless otherwise indicated.

2. On September 11, 2001, I was in New York City when the terrorist attacks of the World Trade Center (WTC) Towers occurred.

3. At the time of these attacks, I was a citizen of Belize. I later became a United States Citizen in 2024. Attached as Exhibit A to this Declaration is a true and correct copy of my current proof of U.S. citizenship.

4. I had been employed with The Port Authority of New York and New Jersey as a Cafeteria Cashier working at the WTC site for approximately fourteen years prior to the events of September 11th. Attached as Exhibit B to this Declaration is a true and correct copy of my proof of employment with The Port Authority at the time of these terrorist attacks.

5. I arrived at the WTC's North Tower for my regular shift on the morning of September 11th.

6. When the first passenger jet, American Airlines Flight 11, crashed into the upper section of the North Tower, I had been working at the cash register in the Port Authority cafeteria on the 44th Floor of the North Tower. I felt the building shake and rumble, and I immediately thought that the building could collapse.

7. I went to the emergency stairwell to exit the building. As I entered the stairwell, I saw a crowd of people running down the stairs to try and exit from the building.

8. As I approached each stairwell landing while descending from the 44th Floor, an ever-increasing number of people also entered the stairwell. At the 26th Floor, I tried to open the doors but they appeared to be locked. A group of people rushing down the stairs trampled over me, and I fell to the concrete and injured my back.

9. A coworker helped me to my feet, and we continued down the stairs until we reached the 3rd Floor landing area. A fireman opened the doors to the 3rd Floor for me, and as I walked through the 3rd Floor to the Mezzanine area, I saw body parts all over the floor and blood splattered on the walls. The scene was horrific.

10. As I exited the North Tower to the street level, I realized that the South Tower had collapsed. I saw more dismembered bodies around the North Tower as people were jumping to their deaths. The people around me then yelled, "Run! Run!" Due to the panic, a crowd of people rushed passed me and knocked me to the ground. Several people trampled over me as they tried to escape from the area, and I received additional injuries to my lower back.

11. A police office came to my aid and pulled me away from the area in front of the North Tower, and I managed to limp away from the scene on foot before the North Tower collapsed.

12. Due to the chaos in Lower Manhattan, I could not find any transportation to take me to my home. I then walked for miles and miles for almost eight hours until I reached my home.

13. Shortly after the events of 9/11, I sought medical treatment for my back injuries. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant documents and medical records<sup>1</sup> related to the treatment that I received following the September 11, 2001 terrorist attacks.

14. As a result of the terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: a lower back injury with herniated discs in my spine at multiple levels<sup>2</sup>. As part of my treatment for my lower back injuries, I have undergone two surgical procedures, including a lumbar microdiscectomy in January of 2004 and a percutaneous lumbar discectomy at two levels with an injection in my spine in March of 2006<sup>3</sup>.

15. Due to my experience on 9/11 and my memories of that fateful day, I also have received continuous treatment for depression and post-traumatic stress disorder<sup>4</sup> (PTSD).

16. My physical and emotional injuries from 9/11 have also been confirmed by the September 11th Victim Compensation Fund (VCF)<sup>5</sup>.

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<sup>1</sup> See, 9/11 Injury Records of Thelma Savery (SAVERY\_MEDS\_0001), attached hereto as Exhibit C, at 0001-0050.

<sup>2</sup> *Id.* at 0005, 0007, 0009, 0011, 0013, 0015, 0019-0021, 0023-0024, 0030-0035, 0039-0046, and 0048.

<sup>3</sup> *Id.* at 0027-0030, 0031, 0034, 0039-0040, and 0048.

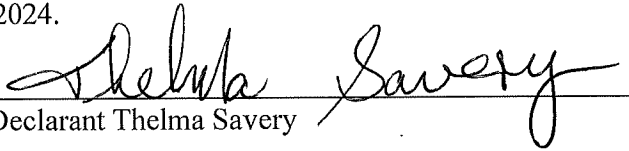
<sup>4</sup> *Id.* at 0012, 0016-0018, and 0025-0026.

<sup>5</sup> *Id.* at 0001-0003.

17. I previously pursued a claim (Claim Number VCF 212-000965) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred as a result of the September 11, 2001 terrorist attacks, and my claim was determined to be eligible.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 14 day of February 2024.

  
Declarant Thelma Savery

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
5716)**